

# **EXHIBIT 5**

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Monday, September 21, 2015 4:40 PM  
**To:** 'Brown, David (Cardiology)'  
**Cc:** Shawn Fox; Rebecca King  
**Subject:** Goulet : Expert report of Dr. Abdulla  
**Attachments:** MDL Expert Report - Abdulla - Goulet (Final) 06.15.15.pdf

Dear Dr. Brown,

Since the meeting on May 29<sup>th</sup> Dr. Ra-id Abdulla has produced an expert report for the *Goulet* matter. Attached is a copy of his report dated June 15<sup>th</sup>, 2015 for your review. Thank you.

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**

Main 800.925.7216 | Fax 866.709.2333

[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Friday, July 17, 2015 3:44 PM  
**To:** Brown, David (Cardiology); 'Miranda, Sandra'  
**Cc:** Sean P. Tracey; Shawn Fox; Rebecca King  
**Subject:** Goulet v. Pfizer  
**Attachments:** ACOR ltr AMended NOD of David Brown 07.17.15.pdf

Dear Dr. Brown,

Please find attached a copy of your First Amended Notice of Oral & Videotaped Deposition. Thank you.

DANIEL OLIVO | PARALEGAL

Offices in Houston | Dallas | San Antonio  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Friday, July 17, 2015 8:49 AM  
**To:** Brown, David (Cardiology)  
**Cc:** Sean P. Tracey; Shawn Fox; Rebecca King  
**Subject:** Goulet v. Pfizer  
**Attachments:** NOD of David Brown MD 07.16.15.pdf; ACOR ltr Depo dates for Dr. Brown. 07.01.15.pdf

Dear Dr. Brown,

We have noticed your deposition for Tuesday, September 22<sup>nd</sup> beginning at 1 pm EST. The deposition notice is attached for your records. Thank you.

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Thursday, July 16, 2015 9:18 AM  
**To:** Brown, David (Cardiology)  
**Cc:** Sean P. Tracey; Shawn Fox; Rebecca King  
**Subject:** Goulet v. Pfizer

Dear Dr. Brown,

We would like to move forward with noticing your deposition in the *Madison Goulet* matter. Are you still available Tuesday, **September 22<sup>nd</sup>** at 9 am EST? If so, we will notice your deposition accordingly. Thank you.

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Sean P. Tracey  
**Sent:** Thursday, July 09, 2015 7:14 PM  
**To:** Brown, David (Cardiology); Daniel Olivo  
**Cc:** Shawn Fox; Rebecca King; Lawrence Tracey  
**Subject:** RE: Goulet v. Pfizer

David

Shawn also points out that Data were extracted from the central database of EUROCAT [60]. EUROCAT registries collect data on live births, stillbirths and late fetal deaths from 20 weeks gestation, and terminations of pregnancy for fetal anomaly (TOPFAs)

This does what north american registries cannot do and that is determine whether fetal deaths are due to CHD.

Sean Patrick Tracey  
Tracey & Fox  
Offices in Houston | Dallas | San Antonio Main 800.925.7216 | Fax 866.709.2333 [www.traceylawfirm.com](http://www.traceylawfirm.com)

Board Certified-Personal Injury Trial Law-Texas Board of Legal Specialization Certified Civil Trial Specialist-National Board of Trial Advocacy American Board of Trial Advocates

Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

---

From: Brown, David (Cardiology) [David.Brown@CARDIO.CHBOSTON.ORG]  
Sent: Thursday, July 09, 2015 4:50 PM  
To: Daniel Olivo  
Cc: Sean P. Tracey; Shawn Fox; Rebecca King; Lawrence Tracey  
Subject: RE: Goulet v. Pfizer

Thanks.

I'll be interested to hear what Sean thinks about this study released in BMJ today from the CDC:

<http://www.npr.org/sections/health-shots/2015/07/09/421203272/some-antidepressants-may-pose-increased-risk-of-birth-defects>

David Brown

From: Daniel Olivo [mailto:[dolivo@traceylawfirm.com](mailto:dolivo@traceylawfirm.com)]  
Sent: Thursday, July 09, 2015 3:25 PM

To: Brown, David (Cardiology)  
Cc: Sean P. Tracey; Shawn Fox; Rebecca King; Lawrence Tracey  
Subject: Goulet v. Pfizer

Dear Dr. Brown,

Mr. Sean Tracey requested that I forward you the attached EUROCAT study that was just published today. Thank you.

- 2015. Wemakor et al. SSRI antidepressant use in 1st trimester pregnancy & risk of specific congenital anomalies. a European register based study

Daniel Olivo | Paralegal

Offices in Houston | Dallas | San Antonio Main 800.925.7216 | Fax 866.709.2333  
www.traceylawfirm.com<[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.traceylawfirm.com&d=BQMFAg&c=qS4goWBT7poplM69zy\\_3xhKwEW14JZMSdioCoppxeFU&r=ZubhBg28eq0FX2vLKmpv7SL3\\_UnS7wrAGPColbhUTx8&m=nK\\_1qhPyG7QiF6rk\\_wx\\_YO26Z6Uf4auPaDgzvG9D-G4&s=U5q3mvVkfi2cAzZ7DmdajGtr39nxsdlqtSvmt7\\_Eo0&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.traceylawfirm.com&d=BQMFAg&c=qS4goWBT7poplM69zy_3xhKwEW14JZMSdioCoppxeFU&r=ZubhBg28eq0FX2vLKmpv7SL3_UnS7wrAGPColbhUTx8&m=nK_1qhPyG7QiF6rk_wx_YO26Z6Uf4auPaDgzvG9D-G4&s=U5q3mvVkfi2cAzZ7DmdajGtr39nxsdlqtSvmt7_Eo0&e=>)>

[cid:image001.png@01D0BA6F.CC3FE4E0]

Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

## Daniel Olivo

---

**From:** Sean P. Tracey  
**Sent:** Thursday, July 09, 2015 6:29 PM  
**To:** Brown, David (Cardiology); Daniel Olivo  
**Cc:** Shawn Fox; Rebecca King; Lawrence Tracey  
**Subject:** RE: Goulet v. Pfizer

Dr. Brown

This has been the subject of much talk today especially in light of the WHO study which was much larger and from multiple countries. In the WHO study, they found all SSRI's to be associated with certain birth defects and Zoloft to be associated with a nearly tripling of the risk of severe cardiac defects (including TGA). I need to re read closely but I think Zoloft had the highest odds ratio's and tightest confidence intervals. In the CDC study they found some SSRI's to be implicated in BD's but not Zoloft. I am suspicious of this study and I suspect there may be classification errors as there have been in other U.S. birth defect studies. The size of the WHO study I think makes it a more important finding. I did find it curious they were published one day apart. We are also exploring the ties to Pharma from the authors of the BMJ paper. I know several epidemiologists who think the BMJ study has serious methodological flaws and I am waiting there take on in.

Sean Patrick Tracey  
Tracey & Fox  
Offices in Houston | Dallas | San Antonio Main 800.925.7216 | Fax 866.709.2333 [www.traceylawfirm.com](http://www.traceylawfirm.com)

Board Certified-Personal Injury Trial Law-Texas Board of Legal Specialization Certified Civil Trial Specialist-National Board of Trial Advocacy American Board of Trial Advocates

Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

---

From: Brown, David (Cardiology) [David.Brown@CARDIO.CHBOSTON.ORG]  
Sent: Thursday, July 09, 2015 4:50 PM  
To: Daniel Olivo  
Cc: Sean P. Tracey; Shawn Fox; Rebecca King; Lawrence Tracey  
Subject: RE: Goulet v. Pfizer

Thanks.

I'll be interested to hear what Sean thinks about this study released in BMJ today from the CDC:

<http://www.npr.org/sections/health-shots/2015/07/09/421203272/some-antidepressants-may-pose-increased-risk-of-birth-defects>

David Brown



From: Daniel Olivo [mailto:dolivo@traceylawfirm.com]  
Sent: Thursday, July 09, 2015 3:25 PM  
To: Brown, David (Cardiology)  
Cc: Sean P. Tracey; Shawn Fox; Rebecca King; Lawrence Tracey  
Subject: Goulet v. Pfizer

Dear Dr. Brown,

Mr. Sean Tracey requested that I forward you the attached EUROCAT study that was just published today. Thank you.

- 2015. Wemakor et al. SSRI antidepressant use in 1st trimester pregnancy & risk of specific congenital anomalies. a European register based study

Daniel Olivo | Paralegal

Offices in Houston | Dallas | San Antonio Main 800.925.7216 | Fax 866.709.2333  
www.traceylawfirm.com<[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www.traceylawfirm.com&d=BQMFAg&c=qS4goWBT7poplM69zy\\_3xhKwEW14JZMSdioCoppxeFU&r=ZubhBg28eq0FX2vLKmpv7SL3\\_UnS7wrAGPColbhUTx8&m=nK\\_1qhPyG7QiF6rk\\_wx\\_YO26Z6Uf4auPaDgzvG9D-G4&s=U5q3mvVkfi2cAzZ7DmdajGtr39nxsdlqtSvmt7\\_Eo0&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.traceylawfirm.com&d=BQMFAg&c=qS4goWBT7poplM69zy_3xhKwEW14JZMSdioCoppxeFU&r=ZubhBg28eq0FX2vLKmpv7SL3_UnS7wrAGPColbhUTx8&m=nK_1qhPyG7QiF6rk_wx_YO26Z6Uf4auPaDgzvG9D-G4&s=U5q3mvVkfi2cAzZ7DmdajGtr39nxsdlqtSvmt7_Eo0&e=>)>

[cid:image001.png@01D0BA6F.CC3FE4E0]

Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Brown, David (Cardiology) <David.Brown@CARDIO.CHBOSTON.ORG>  
**Sent:** Thursday, July 09, 2015 4:51 PM  
**To:** Daniel Olivo  
**Cc:** Sean P. Tracey; Shawn Fox; Rebecca King; Lawrence Tracey  
**Subject:** RE: Goulet v. Pfizer

Thanks.

I'll be interested to hear what Sean thinks about this study released in BMJ today from the CDC:

<http://www.npr.org/sections/health-shots/2015/07/09/421203272/some-antidepressants-may-pose-increased-risk-of-birth-defects>

David Brown

---

**From:** Daniel Olivo [mailto:dolivo@traceylawfirm.com]  
**Sent:** Thursday, July 09, 2015 3:25 PM  
**To:** Brown, David (Cardiology)  
**Cc:** Sean P. Tracey; Shawn Fox; Rebecca King; Lawrence Tracey  
**Subject:** Goulet v. Pfizer

Dear Dr. Brown,

Mr. Sean Tracey requested that I forward you the attached EUROCAT study that was just published today. Thank you.

- 2015. Wemakor et al. SSRI antidepressant use in 1st trimester pregnancy & risk of specific congenital anomalies. a European register based study

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)

---

**TF** | **TRACEY & FOX**  
Catastrophic Injury • Product Liability

---

Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Thursday, July 09, 2015 2:21 PM  
**To:** 'Brown, David (Cardiology)'  
**Cc:** Sean P. Tracey; Shawn Fox; Rebecca King; Lawrence Tracey  
**Subject:** Goulet v. Pfizer  
**Attachments:** 2015. Wemakor et al. SSRI antidepressant use in 1st trimester pregnancy & risk of specific congenital anomalies. a european register based study. Appendix 1.docx; 2015. Wemakor et al. SSRI antidepressant use in 1st trimester pregnancy & risk of specific congenital anomalies. a european register based study.pdf

Dear Dr. Brown,

Mr. Sean Tracey requested that I forward you the attached EUROCAT study that was just published today. Thank you.

- 2015. Wemakor et al. SSRI antidepressant use in 1st trimester pregnancy & risk of specific congenital anomalies. a European register based study

**DANIEL OLIVO | PARALEGAL**

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Wednesday, July 01, 2015 4:20 PM  
**To:** 'Brown, David (Cardiology)'; 'Miranda, Sandra'  
**Cc:** Sean P. Tracey; Shawn Fox; Rebecca King  
**Subject:** Goulet v. Pfizer: Epidemiological studies  
**Attachments:** 2010 - Kornum et al, Use of Selective Serotonin Reuptake Inhibitors During Early Pregnancy and Risk of Congenital Malformations - Updated Analysis.pdf; 2012. Jimenez-Solem.pdf; 2009. Pedersen et al. SSRIs in pregnancy and congenital malformations. population based cohort study.pdf; 2011 - Colvin et al, Dispensing Patterns and Outcomes for Women Dispensed Selective Serotonin Reuptake Inhibitors in Pregnancy.pdf; 2014- Ban et al, Maternal depression AD and cong anom risk in offspring- a pop cohort.pdf; 2014. Huybrechts & Urato. Preterm Birth & ANTidepressant medication use in pregnancy. Meta Analysis.pdf; 2006-7- Chart for -nejm\_louik\_2675sa1.pdf; 2007 - Louik et al, First-Trimester Use of Selective Serotonin Reuptake Inhibitors and the Risk of Birth Defects.pdf; 2007 - Kallen et al, Maternal Use of Selective Serotonin Reuptake Inhibitors in Early Pregnancy and Infant Congenital Malformations.pdf; 2011 - Malm et al, Selective Serotonin Reuptake Inhibitors and Risk for Major Congenital Anomalies.pdf; 2007 - Alwan et al, Supplementary Appendix to Use of Selective Serotonin Reuptake Inhibitors in Pregnancy and the Risk of Birth Defects.pdf; 2007 - Alwan et al, Use of Selective Serotonin Reuptake Inhibitors in prgnancy and the Risk of Birth Defects.pdf

Dear Dr. Brown,

Please find attached the following epidemiological studies you requested.

- 1) 2010 - Kornum et al, Use of Selective Serotonin Reuptake Inhibitors During Early Pregnancy and Risk of Congenital Malformations - Updated Analysis
- 2) 2012-Jimenez-Solem et al. Exposure to SSRI's and the risk of congenital malformations: a nationwide cohort study
- 3) 2009-Pedersen et al. SSRI's in Pregnancy and Congenital malformations: population based cohort study
- 4) 2011. Colvin et al. Dispensing Patterns and Pregnancy Outcomes for Women Dispensed SSRI's in Pregnancy.
- 5) 2014. Ban et al. Maternal Depression, antidepressant prescriptions, and congenital anomaly risk in offspring: a population based cohort study
- 6) 2014. Huybrechts et al. Preterm birth and antidepressant medication use during pregnancy: a systematic review and meta-analysis
- 7) 2007. Louik, et al. First Trimester Use of SSRI's and the Risk of Birth Defects & Appendix.
- 8) 2007. Kallen et al. Maternal Use of SSRI's in early pregnancy and Infant Congenital Malformations.
- 9) 2011. Malm et al. SSRI's and Risk for Major Congenital Anomalies
- 10) 2007. Alwan, et al. Use of SSRI's in Pregnancy and the Risk of Birth Defects with Supplementary Appendix.

**DANIEL OLIVO | PARALEGAL**

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

## Daniel Olivo

---

**From:** Brown, David (Cardiology) <David.Brown@CARDIO.CHBOSTON.ORG>  
**Sent:** Wednesday, July 01, 2015 2:57 PM  
**To:** Daniel Olivo  
**Cc:** Sean P. Tracey; Miranda, Sandra; Santimauro, Janine  
**Subject:** RE: Goulet v. Pfizer

Thanks, we got it,  
David

---

**From:** Daniel Olivo [mailto:dolivo@traceylawfirm.com]  
**Sent:** Wednesday, July 01, 2015 3:05 PM  
**To:** Brown, David (Cardiology)  
**Cc:** Sean P. Tracey  
**Subject:** Goulet v. Pfizer

Dear Dr. Brown,

Attached is a copy of the transmittal letter and check that was mailed to your office on May 29<sup>th</sup>. Thank you.

DANIEL OLIVO | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Wednesday, July 01, 2015 2:09 PM  
**To:** Brown, David (Cardiology)  
**Cc:** Sean P. Tracey  
**Subject:** Madison Goulet vs. Pfizer, Inc., et al: Goulet v. Pfizer  
**Attachments:** Brown ltr FWD Check 05.29.15

Dear Dr. Brown,

Attached is a copy of the transmittal letter and check that was mailed to your office on May 29<sup>th</sup>. Thank you.

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Brown, David (Cardiology) <David.Brown@CARDIO.CHBOSTON.ORG>  
**Sent:** Thursday, June 04, 2015 8:04 AM  
**To:** Daniel Olivo  
**Subject:** RE: Goulet, Madison

OK thanks

---

**From:** Daniel Olivo [mailto:dolivo@traceylawfirm.com]  
**Sent:** Wednesday, June 03, 2015 4:37 PM  
**To:** Brown, David (Cardiology)  
**Cc:** Shawn Fox  
**Subject:** Goulet, Madison

Dear Dr. Brown,

Madison's life care planner would like to speak to you about Madison's diagnosis, care and prognosis. She will be contacting you soon to touch base and coordinate.

In the meantime, her name is Kimberly Kushner, RN, MSN. She works with BalaCare Nursing Solutions. Her contact info is 610-664-8760 and email address is [kimberly@balacare.com](mailto:kimberly@balacare.com). Thank you.

**DANIEL OLIVO | PARALEGAL**

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.



**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Wednesday, June 03, 2015 3:41 PM  
**To:** 'Brown, David (Cardiology)'  
**Cc:** Shawn Fox  
**Subject:** Goulet, Madison

Dear Dr. Brown,

Madison's life care planner would like to speak to you about Madison's diagnosis, care and prognosis. She will be contacting you soon to touch base and coordinate.

In the meantime, her name is Kimberly Kushner, RN, MSN. She works with BalaCare Nursing Solutions. Her contact info is 610-664-8760 and email address is [kimberly@balacare.com](mailto:kimberly@balacare.com). Thank you.

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.



Catastrophic Injury ♦ Product Liability

Offices in Houston | Dallas | San Antonio  
800.925.7216

May 29, 2015

**VIA FIRST CLASS MAIL**

Attention: Sandra Miranda  
Department of Cardiology  
Boston Children's Hospital  
300 Longwood Avenue, Ste. Farley 205  
2<sup>nd</sup> Floor  
Boston, MA 02115

RE: In Re Zolof MDL No. 2342; Case No. 3:12-cv-00218-GPM-PMF; *Jessica Goulet and Dana Goulet, Individually and as Parents & Natural Guardians of Plaintiff, M.D.G., a minor vs. Pfizer, Inc., et al.*; In the United States District Court for the Eastern District of Pennsylvania

Your Patient/ My client: Madison Goulet  
DOB: 8/20/2004  
SSN: 002-02-0711

Dear Ms. Miranda:

Please find enclosed our firm check in the amount of \$1,000.00 payable to Boston Children's Heart Foundation. Dr. David Brown requested that we mail you this check as payment for the meeting. Thank you.

Very truly yours,

**Tracey & Fox**

A handwritten signature in dark ink, appearing to read 'Daniel Olivo', written over a horizontal line.

Daniel Olivo  
Paralegal-Houston Office

/do  
Check No. 7244

7244

**TRACEY AND FOX LAW FIRM**

OPERATING ACCOUNT  
440 LOUISIANA ST STE 1901  
HOUSTON, TX 77002

CADENCE BANK, N.A.  
61-629-622

5/29/2015

PAY TO THE  
ORDER OF Boston Children's Heart Foundation

\$ \*\*1,000.00

One Thousand and 00/100\*\*\*\*\*

DOLLARS

Boston Children's Heart Foundation  
Boston Children's Hospital  
300 Longwood, Ste Farley 205  
Boston, MA 02115



AUTHORIZED SIGNATURE

MEMO

Donation (Contact: Dr. David Brown)

Security features. Details on back.



86007103-08

⑈007244⑈ ⑆062206295⑆ 5500082051⑈

## Daniel Olivo

---

**From:** Daniel Olivo  
**Sent:** Friday, May 22, 2015 3:00 PM  
**To:** 'Brown, David (Cardiology)'  
**Cc:** Rebecca King; Shawn Fox; Sean P. Tracey  
**Subject:** RE: Goulet v. Pfizer  
**Attachments:** Brown MD ltr Re Deposition 05.22.15.pdf

Dear Dr. Brown,

Please find attached our correspondence regarding our request for your deposition. Thank you.

We look forward to meeting with you next week.

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

---

**From:** Brown, David (Cardiology) [mailto:David.Brown@CARDIO.CHBOSTON.ORG]  
**Sent:** Thursday, May 21, 2015 1:53 PM  
**To:** Daniel Olivo  
**Cc:** Rebecca King; Shawn Fox; Sean P. Tracey  
**Subject:** RE: Goulet v. Pfizer

Daniel –

Thanks for these materials.

I had to review this with our own hospital lawyers (hospital policy) and they stipulated that I receive an official written “notice” from your firm outlining exactly what you are asking of me and in what capacity,

Thanks  
David Brown

David W. Brown, MD  
Department of Cardiology

Boston Childrens Hospital  
300 Longwood Avenue  
Boston, MA 02115  
Phone: 617-355-6429  
Fax: 617-739-6282  
Email: david.brown@cardio.chboston.org



**Boston Children's Hospital**

---

**From:** Daniel Olivo [<mailto:dolivo@traceylawfirm.com>]  
**Sent:** Friday, May 15, 2015 2:50 PM  
**To:** Brown, David (Cardiology)  
**Cc:** Rebecca King; Shawn Fox; Sean P. Tracey  
**Subject:** Goulet v. Pfizer

Dear Dr. Brown,

Please find attached the following materials for your review.

- **Madison Goulet's genetic testing from Signature Genomics dated 11/26/13;**
- **Expert Report of Nicholas Jewell, Ph.D. dated 03/06/2015**

If you have any questions regarding this matter we may be reached at 713-495-2333. Thank you.

**DANIEL OLIVO | PARALEGAL**

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)

---

**TF | TRACEY & FOX**

**Catastrophic Injury • Product Liability**

Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.



Catastrophic Injury • Product Liability

Offices in Houston | Dallas | San Antonio  
800.925.7216

May 22, 2015

**VIA ELECTRONIC MAIL**

David W. Brown, MD  
Department of Cardiology  
Boston Childrens Hospital  
300 Longwood Avenue  
Boston, MA 02115

RE: In Re Zolof MDL No. 2342; Case No. 3:12-cv-00218-GPM-PMF; *Jessica Goulet and Dana Goulet, Individually and as Parents & Natural Guardians of Plaintiff, M.D.G., a minor vs. Pfizer, Inc., et al.*; In the United States District Court for the Eastern District of Pennsylvania

Your Patient/ My client: Madison Goulet  
DOB: 8/20/2004  
SSN: 002-02-0711

**DEPOSITION REQUEST OF DR. DAVID BROWN**

Dear Dr. Brown:

We represent your patient, Madison Goulet, and her parents in a case against Pfizer regarding Jessica Goulet's ingestion of Zolof during her pregnancy. The case is pending in MDL 2342 in the Eastern District of Pennsylvania before the Honorable Cynthia M. Rufe. This case is strictly a products liability case. Your care and treatment of Madison Goulet is not being questioned in any way. Further, there are no allegations being made against any healthcare provider in this case. Madison's case has been selected by Judge Rufe as the second Zolof MDL case to be tried sometime next year. As a trial case, Judge Rufe has entered discovery orders governing deadlines for discovery and depositions of witnesses, including treating physicians.

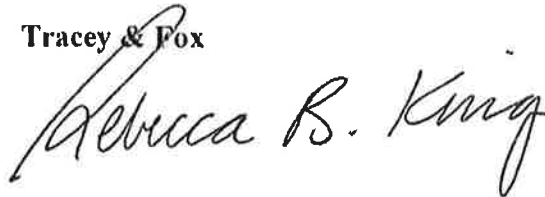
As Madison's treating cardiologist, your testimony is relevant and necessary in a number of respects. First, your care and treatment of Madison is relevant to the damages claimed in the case and necessary to describe for the Court and jury the nature of Madison's heart defects. You will be asked about her specific heart defects, the surgical repair of those defects and her ongoing treatment and monitoring. Additionally, you will be asked about her expected future treatment, including the possibility of future surgical intervention and/or complications. You may also be asked about the prevalence, diagnosis and causes of congenital heart defects based upon your experience, education and training.

We know that you are busy taking care of critically ill children. We certainly appreciate you taking time out of your demanding schedule to provide this important testimony. In these cases, it is customary for treating physicians to be compensated by the parties for their time away from their practices for the purpose of being deposed. If the hospital has a standard fee schedule for such situations, please have them provide it to us. Attached to this letter, please find a HIPAA compliant medical authorization authorizing you to discuss Madison's medical care and treatment with us.

Should you or the attorneys for Boston Children's Hospital have any additional questions, please do not hesitate to contact me at 713-495-2333 or via email at [rking@traceylawfirm.com](mailto:rking@traceylawfirm.com).

Very truly yours,

Tracey & Fox

A handwritten signature in black ink that reads "Rebecca B. King". The signature is written in a cursive style with a large, stylized "R" at the beginning.

Rebecca B. King

RK/do

Attachment: Authorization

## AUTHORIZATION FOR RELEASE OF RECORDS AND DECLARATION OF RELATIONSHIP

I hereby authorize and allow the following company (print):

<b>NAME OF COMPANY/FACILITY:</b> Boston childrens Hospital / Dr. Brown		
<b>Address:</b> 300 Longwood Ave		
<b>City:</b> Boston	<b>State:</b> MA	<b>Zip:</b>

To release information from records, files and other gathered information pertaining to:

<b>FULL NAME:</b> MADISON Goulet	
<b>Date of Birth:</b> 8/20/04	<b>Social Security Number:</b> 002-02-0711

Please release the following information to my Lawyers named below:

- |  |  |
|--|--|
| <input type="checkbox"/> Any and All Personnel/Employment Records<br><input type="checkbox"/> Any and All Payroll Records/Information<br><input type="checkbox"/> Any and All Personnel File Materials<br><input type="checkbox"/> Any and All Work-Related Injury Records<br><input type="checkbox"/> Any and All Attendance/Shift Records<br><input type="checkbox"/> All Medical Records in Entirety<br><input type="checkbox"/> All Third-Party Medical Records<br><input type="checkbox"/> All Doctor/Nurse Handwritten Notes<br><input type="checkbox"/> All Admission/Discharge Records<br><input type="checkbox"/> All Films, Scans, Photos & Videos<br><input type="checkbox"/> Other _____ | <input type="checkbox"/> Any and All Employment Applications<br><input type="checkbox"/> Any and All Disciplinary Information<br><input type="checkbox"/> Any and All Health Records<br><input type="checkbox"/> Any and All Disability Records<br><input type="checkbox"/> All Third-Party Billing Records<br><input type="checkbox"/> All Laboratory & Test Result Records<br><input type="checkbox"/> All Radiology Records<br><input type="checkbox"/> All Insurance Records/Information<br><input type="checkbox"/> All Demographic Information<br><input type="checkbox"/> All Billing Records/Information<br><input type="checkbox"/> Other _____ |
|--|--|

The purpose of this authorization is to aid in the investigation of a legal claim for injuries and/or damages. I understand this authorization may be revoked in writing at any time but I ratify the release of any information prior to revocation of this authorization. I hereby waive any privilege I have to said information to my lawyers. Photocopies are to be given the same effect as the original. I understand the information disclosed pursuant to this authorization may be subject to re-disclosure by the recipient and may no longer be protected by federal law. I understand the above medical provider may not condition treatment, payment, enrollment, or eligibility for benefits on my agreement to sign this authorization.

By writing my initials, I include in this authorization permission to disclose the following:

_____ Alcohol and/or Drug Abuse Treatment	_____ Psychiatric Records
_____ Sexually Transmitted Disease Information	_____ HIV or AIDS Information

All prior authorizations are hereby canceled. I intend this to be valid for a period of 180 days from the date below. If I am signing for the person named above in a representative capacity, I hereby declare that relationship by writing my initials below my signature.

\_\_\_\_\_  
Patient's (or Representative's) Signature

\_\_\_\_\_  
Date

**My relationship to person named above: (Please initial)**

_____ Patient	_____ Parent
_____ Administrator	_____ Guardian
_____ Representative	

**LAWYERS:** Tracey Law Firm  
440 Louisiana Street, Suite 1901  
Houston, TX 77002



**Daniel Olivo**

---

**From:** Brown, David (Cardiology) <David.Brown@CARDIO.CHBOSTON.ORG>  
**Sent:** Thursday, May 21, 2015 1:53 PM  
**To:** Daniel Olivo  
**Cc:** Rebecca King; Shawn Fox; Sean P. Tracey  
**Subject:** RE: Goulet v. Pfizer

Daniel –

Thanks for these materials.

I had to review this with our own hospital lawyers (hospital policy) and they stipulated that I receive an official written “notice” from your firm outlining exactly what you are asking of me and in what capacity,

Thanks

David Brown

David W. Brown, MD  
Department of Cardiology  
Boston Childrens Hospital  
300 Longwood Avenue  
Boston, MA 02115  
Phone: 617-355-6429  
Fax: 617-739-6282  
Email: david.brown@cardio.chboston.org



---

**From:** Daniel Olivo [mailto:dolivo@traceylawfirm.com]  
**Sent:** Friday, May 15, 2015 2:50 PM  
**To:** Brown, David (Cardiology)  
**Cc:** Rebecca King; Shawn Fox; Sean P. Tracey  
**Subject:** Goulet v. Pfizer

Dear Dr. Brown,

Please find attached the following materials for your review.

- **Madison Goulet’s genetic testing from Signature Genomics dated 11/26/13;**
- **Expert Report of Nicholas Jewell, Ph.D. dated 03/06/2015**

If you have any questions regarding this matter we may be reached at 713-495-2333. Thank you.

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm.

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Friday, May 15, 2015 10:56 AM  
**To:** 'david.brown@cardio.chboston.org'  
**Cc:** Rebecca King; Shawn Fox; Sean P. Tracey  
**Subject:** Madison Goulet vs. Pfizer, Inc., et al: Goulet v. Pfizer  
**Attachments:** Genetic Testing re Goulet .pdf; Expert Report of Nicholas Jewell - Zolof MDL.pdf

Dear Dr. Brown,

Please find attached the following materials for your review.

- **Madison Goulet's genetic testing from Signature Genomics dated 11/26/13;**
- **Expert Report of Nicholas Jewell, Ph.D. dated 03/06/2015**

If you have any questions regarding this matter we may be reached at 713-495-2333. Thank you.

**DANIEL OLIVO** | PARALEGAL

**Offices in Houston | Dallas | San Antonio**  
Main 800.925.7216 | Fax 866.709.2333  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



Confidentiality Notice: This email and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the firm,

**Daniel Olivo**

---

**From:** Daniel Olivo  
**Sent:** Friday, June 20, 2014 11:15 AM  
**To:** david.brown@cardio.chboston.org  
**Cc:** Rebecca King; Shawn Fox  
**Subject:** Your patient, Madison Goulet

**MADISON GOULET**, minor child  
DOB: 8/20/2004  
SSN: xxx-xx-0711

Dear Dr. Brown,

We represent Jessica and Dana Goulet, and their daughter, Madison Goulet, in connection with a claim against Pfizer, Inc. for birth defects related to her mother's ingestion of Zoloft while she was pregnant.

It is our understanding that you are Madison's current treating pediatric cardiologist. Therefore, we would like to set a brief call with you to discuss Madison's heart defect, treatment and prognosis. Additionally, we would greatly appreciate it if you will provide us with a few dates in July or August for a deposition as Counsel for Defendant Pfizer has requested dates for your deposition. You will, of course, be reimbursed for your time. The deposition will take place at a time and location convenient to you. **This case is not about the standard of care relating to your treatment of Madison Goulet. You are not a defendant in this case and never will be.**

We are under some pretty stringent time deadlines under Judge Rufe's orders and would like to expedite this meeting with you. **Please contact us at your earliest convenience at (713) 494-2333.** I apologize for disturbing you with this matter, but there is no other way to obtain this information. Thank you in advance for your cooperation. We look forward to hearing from you soon.

Daniel Olivo  
Paralegal  
Tracey Law Firm  
440 Louisiana, 19th Floor  
Houston, Texas 77002  
713-495-2333 Office  
713-495-2331 Facsimile  
[www.traceylawfirm.com](http://www.traceylawfirm.com)



**Confidentiality Notice:** This e-mail and any files transmitted with it are confidential and may be protected by legal privilege. It is intended solely for the use of the individual or entity to whom it is addressed. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this message in error and delete all copies. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Any views or opinions presented in this e-mail are solely those of the author and do not necessarily represent those of the firm.